

Carol Egleston

July 10, 2005

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow-up. This could cause major record keeping and administrative problems. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if there were no wrongdoing on my part.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. This would be an impractical and time-consuming practice. The proposed

rule also includes the language, “If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers” and prospects will be understandably concerned about their privacy. I find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for nearly 9 years. I became a Consultant because I love the products and our family was in need of a second source of potential income. We looked at Arbonne as an opportunity to get out of credit card debt and hopefully establish some sort of Plan B. Not only has my Arbonne business eliminated my prior credit card debt it has now become our Plan A, B, and C! Because of Arbonne, my husband who is only 41 years old has been allowed to retire from his corporate job and work side by side with me as we continue to build our business. Since starting my Arbonne business, I have developed a team of 4 National Vice Presidents (including myself), 18 Regional Vice Presidents, and thousands more as Area Managers, District Managers, and/or Consultants. Further, consistently, over the past 3 months, my team has brought in over 800 new consultants each month from the US, Canada and Puerto Rico. We are all working together helping our families enjoy better lives.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental, though some may be unintentional, consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like myself.

Thank you for your time, understanding, and consideration in this matter.

Sincerely,

Carol Egleston
Independent Consultant, Executive National Vice President